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| CENTRAL DISTRICT OF CALIFORNIA |            |
| BY: _____                      | DVE DEPUTY |

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

March 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYMOND JOSEPH CLAYDON,  
aka "RJ" and  
RODNEY LEE FOUST,  
aka "Rodney Faust,"

Defendants.

SA CR No. 8:24-cr-00045-JWH

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy;  
18 U.S.C. § 922(a)(1)(A): Engaging  
in the Business of Dealing in  
Firearms Without a License;  
18 U.S.C. § 2(a): Aiding and  
Abetting]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Estate Jewelry Exchange Corp., a California corporation  
doing business as "OC Guns" ("OC Guns"), was a licensed dealer of  
firearms, within the meaning of Chapter 44, Title 18, United States  
Code. OC Guns' retail store was located in Lake Forest, California.

1       2. Defendant RAYMOND JOSEPH CLAYDON, also known as ("aka")  
2 "RJ," was the responsible party for purposes of OC Guns' federal  
3 license.

4       3. Defendant RODNEY LEE FOUST, aka "Rodney Faust," did not  
5 have a federal firearms license issued by the United States Bureau of  
6 Alcohol, Tobacco, Firearms, and Explosives ("ATF"), and thus was not  
7 licensed to import, manufacture, or deal in firearms.

8       4. Co-Conspirator-1 did not have a federal firearms license  
9 issued by ATF, and thus was not licensed to import, manufacture, or  
10 deal in firearms.

11       5. The Grand Jury re-alleges these Introductory Allegations  
12 into each count of this Indictment.

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1 COUNT ONE

2 [18 U.S.C. § 371]

3 [ALL DEFENDANTS]

4 A. OBJECT OF THE CONSPIRACY

5 Beginning on a date unknown to the Grand Jury, and continuing  
6 until at least on or about December 15, 2021, in Orange County,  
7 within the Central District of California, and elsewhere, defendants  
8 RAYMOND JOSEPH CLAYDON, also known as ("aka") "RJ," and RODNEY LEE  
9 FOUST, aka "Rodney Faust," together with Co-Conspirator-1 ("CC-1"),  
10 knowingly conspired and agreed with each other and others known and  
11 unknown to the Grand Jury to commit an offense against the United  
12 States, namely, engaging in the business of dealing in firearms  
13 without a license, in violation of Title 18, United States Code,  
14 Section 922(a)(1)(A).

15 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE

16 ACCOMPLISHED

17 The object of the conspiracy was to be accomplished, in  
18 substance, as follows:

19 1. Defendant FOUST, CC-1, and others, with defendant CLAYDON's  
20 knowledge and often with defendant CLAYDON's express approval, would  
21 purchase firearms or arrange for third-party straw buyers to purchase  
22 firearms knowing that the straw buyers would falsely certify in  
23 completing the transactions that they were bona fide purchasers of  
24 the firearms.

25 2. For firearms purchased outside of California, defendant  
26 FOUST, CC-1, and others would transport or arrange to transport the  
27 firearms to OC Guns in California in order to resell them there.

1       3. Defendants CLAYDON and FOUST, CC-1, and others would resell  
2 or arrange for the resale of the firearms at a significantly  
3 increased price in California, with the transactions often occurring  
4 a short time after the firearms were originally purchased outside  
5 California, making the transactions falsely appear to be bona fide  
6 private consignment sales through OC Guns; they would sell these guns  
7 at inflated prices primarily because the firearms were generally  
8 restricted from ordinary retail sale in California under state law.

9       4. Defendant CLAYDON received a percentage of the proceeds  
10 from all such firearms sales at OC Guns and would pay the remaining  
11 sums to defendant FOUST, CC-1, or the other unlicensed dealers.

12       5. Defendant CLAYDON facilitated and caused other OC Guns  
13 personnel to facilitate the resale of the firearms at OC Guns,  
14 knowing that the firearms' increased price was due to the fact that  
15 the sale of such firearms was restricted in California and knowing  
16 that, OC Guns as a federal firearms licensee, could not sell the  
17 firearms directly from OC Guns' inventory to non-law enforcement  
18 customers.

19 C. OVERT ACTS

20       On or about the following dates, in furtherance of the  
21 conspiracy and to accomplish the object of the conspiracy, defendants  
22 CLAYDON and FOUST, and CC-1, and others known and unknown to the  
23 Grand Jury, committed various overt acts within the Central District  
24 of California, and elsewhere, including, but not limited to, the  
25 following:

26       Overt Act No. 1:   On February 1, 2020, at OC Guns' retail  
27 store, defendant CLAYDON accepted for consignment from defendant  
28 FOUST a Sig Sauer, model P365, 9mm caliber pistol, bearing serial

1 number 66A435997, that defendant FOUST purchased in Ohio on December  
2 24, 2019 and a Glock, model 44, .22 caliber pistol, bearing serial  
3 number ADUR579, that defendant FOUST purchased in Ohio on January 23,  
4 2020.

5 Overt Act No. 2: On March 21, 2020, in text messages,  
6 defendant CLAYDON arranged for CC-1 to purchase between five and ten  
7 Glock, model 19, 9mm caliber pistols.

8 Overt Act No. 3: During a series of text messages in June  
9 2020, CC-1 informed defendant CLAYDON that CC-1 had access to 11  
10 Glock firearms that were available from an out-of-state firearms  
11 business, which CC-1 would have at OC Guns within three days for  
12 resale to defendant CLAYDON's customers. Four days later, defendant  
13 CLAYDON informed CC-1 that he had just received one of the firearms,  
14 that the firearms would sell for \$1,000 each at OC Guns, and that CC-  
15 1 should purchase the remaining Glock firearms, adding, "Tag it. Sell  
16 It. Make us some money. Thank you [CC-1]."

17 Overt Act No. 4: On August 26, 2020, in text messages,  
18 defendant CLAYDON arranged for CC-1 to purchase outside the state of  
19 California, four new Glock, model 19, Generation 5, 9mm caliber  
20 pistols. Specifically, after CC-1 informed defendant CLAYDON that  
21 CC-1 had access to the four firearms and asked if defendant CLAYDON  
22 wanted them, defendant CLAYDON responded, "I do!"

23 Overt Act No. 5: On September 9 and 10, 2020, at OC Guns'  
24 retail store, defendant CLAYDON accepted for consignment from a  
25 relative of CC-1, three Glock, model 19, Generation 5, 9mm caliber  
26 pistols, bearing serial numbers BHNV377, BNKR314, and BNKR318 and a  
27 Glock, model 19, Generation 4, 9mm caliber pistol, bearing serial  
28 number ABSM307.

1       Overt Act No. 6:    On November 20, 2020, at OC Guns' retail  
2 store, defendant CLAYDON accepted for consignment from defendant  
3 FOUST seven firearms that defendant FOUST's relative purchased in  
4 Ohio on November 20, 2020, namely, a Sig Sauer, model 320, 9mm  
5 caliber pistol, bearing serial number 58J106889, two Sig Sauer, model  
6 Hellcat, 9mm caliber pistols, bearing serial numbers BY441346 and  
7 BY487167, a Glock, model 45, 9mm caliber pistol, bearing serial  
8 number BRKR470, a Glock, model 19, Generation 5 pistol, bearing  
9 serial number BRFE690, a Glock, model 17, Generation 5 pistol,  
10 bearing serial number BRPT925, and a CZ, model Shadow 2, 9mm caliber  
11 pistol, bearing serial number D357822.

12       Overt Act No. 7:    On December 24, 2020, in text messages,  
13 defendant CLAYDON arranged for CC-1 to purchase Ruger, model EC9s,  
14 9mm caliber pistols for \$395 each outside the state of California.  
15 During the text message exchange, defendant CLAYDON initially  
16 informed CC-1 that he (defendant CLAYDON) may have trouble selling  
17 the firearms.   However, after CC-1 informed defendant CLAYDON that  
18 the firearms were selling for \$350 each at the out-of-state firearms  
19 business, defendant CLAYDON responded, "Oh yeah.   I can sell them.  
20 That's a good price."

21       Overt Act No. 8:    On June 12, 2021, in text messages,  
22 defendant CLAYDON directed CC-1 to purchase a Smith & Wesson, model  
23 Shields, 9mm caliber pistol.

24       Overt Act No. 9:    Between June 25 and July 6, 2021, an OC Guns  
25 employee accepted for consignment 12 firearms from CC-1, namely, a  
26 Sig Sauer, model P365, 9mm caliber pistol, bearing serial number  
27 66B495897, two Sig Sauer, model P365X, 9mm caliber pistols, bearing  
28 serial numbers 66B336500, and 66A990842, two FN, model 509, 9mm

1 caliber pistols, bearing serial numbers GKS0046685 and GKS0174104,  
2 three Glock, model 43X, 9mm caliber pistols, bearing serial numbers  
3 BTTY676, BSAR964 and BTTE206, a Sig Sauer, model P365XL, 9mm caliber  
4 pistols, bearing serial number 66B623035, a Glock, model 19X, 9mm  
5 caliber pistol, bearing serial number BSLG460; a Glock, model 45, 9mm  
6 caliber pistol, bearing serial number BSAZ403, and a Smith & Wesson,  
7 model Shield, 9mm caliber pistol, bearing serial number RER0761.

8 Overt Act No. 10: On July 16, 2021, an OC Guns employee  
9 accepted for consignment from CC-1 a CZ, model Shadow 2, 9mm caliber  
10 pistol, bearing serial number F070388, that defendant CLAYDON knew  
11 from text messages that CC-1 ordered for defendant CLAYDON.

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1 COUNT TWO

2 [18 U.S.C. §§ 922(a)(1)(A), 2(a)]

3 [ALL DEFENDANTS]

4 Beginning in at least 2017, and continuing to at least December  
 5 1, 2021, in Orange County, within the Central District of California,  
 6 and elsewhere, defendants RAYMOND JOSEPH CLAYDON, also known as  
 7 ("aka") "RJ," and RODNEY LEE FOUST, aka "Rodney Faust," and others  
 8 known and unknown to the Grand Jury, each aiding and abetting the  
 9 other, willfully engaged in the business of dealing in firearms  
 10 without being a licensed importer, manufacturer, or dealer of  
 11 firearms, specifically, the purchase and re-sale of the following  
 12 firearms, on or about the following dates:

| <b>PURCHASE<br/>DATE</b> | <b>RE-SALE<br/>DATE</b> | <b>FIREARM</b>  |
|--------------------------|-------------------------|---|
| 12/19/2019               | 3/16/2020               | a Sig Sauer, model P365, 9mm caliber pistol, bearing serial number NRA013697  |
| 12/19/2019               | 4/18/2020               | a Sig Sauer, model P365, 9mm caliber pistol, bearing serial number 66A627128  |
| 12/19/2019               | 4/22/2020               | a Springfield Armory, model Hellcat, 9mm pistol, bearing serial number AT259415   |
| 12/24/2019               | 3/2/2020                | a Sig Sauer, model P365, 9mm pistol, bearing serial number 66A435997  |
| 1/23/2020                | 7/24/2020               | a Glock, model 44, 22 caliber pistol, bearing serial number ADUR579   |
| 11/20/2020               | 12/2/2020               | a Sig Sauer, model Hellcat, 9mm caliber pistol, bearing serial number BY441346  |
| 11/20/2020               | 12/5/2020               | (1) a Sig Sauer, model 320, 9mm caliber pistol, bearing serial number 58J106889; (2) a Glock, model 19, Generation 5 pistol, bearing serial number BRFE690; and (3) a CZ, model Shadow 2, 9mm caliber pistol, bearing serial number D357822 |

| PURCHASE<br>DATE | RE-SALE<br>DATE | FIREARM  |
|------------------|-----------------|--|
| 11/20/2020       | 1/26/2021       | a Glock, model 45, 9mm caliber pistol, bearing serial number BRKR470           |
| 11/20/2020       | 2/24/2021       | a Sig Sauer, model Hellcat, 9mm caliber pistol, bearing serial number BY487167 |
| 11/20/2020       | 5/18/2021       | a Glock, model 17, Generation 5 pistol, bearing serial number BRPT925          |

1 COUNT THREE

2 [18 U.S.C. §§ 922(a)(1)(A); 2(a)]

3 [DEFENDANT CLAYDON]

4 Beginning in at least 2016, and continuing to at least December  
 5 15, 2021, in Orange County, within the Central District of  
 6 California, and elsewhere, defendant RAYMOND JOSEPH CLAYDON, also  
 7 known as "RJ," Co-Conspirator-1, and others known and unknown to the  
 8 Grand Jury, each aiding and abetting the other, willfully engaged in  
 9 the business of dealing in firearms without being a licensed  
 10 importer, manufacturer, or dealer of firearms, specifically, the  
 11 purchase and re-sale of the following firearms, on or about the  
 12 following dates:

| <b>PURCHASE<br/>DATE</b> | <b>RE-SALE<br/>DATE</b> | <b>FIREARM(S)</b>   |
|--------------------------|-------------------------|---|
| 4/28/2021                | 7/13/2021               | (1) a Glock, model 19X, 9mm caliber pistol, bearing serial number BSLG460; and (2) a Glock, model 45, 9mm caliber pistol, bearing serial number BSAZ403 |
| 4/28/2021                | 7/16/2021               | a Sig Sauer, model P365, 9mm caliber pistol, bearing serial number 66B495897  |
| 4/28/2021                | 7/23/2021               | a Glock, model 43X, 9mm caliber pistol, bearing serial number BSAR964   |
| 5/21/2021                | 7/7/2021                | two FN, model 509, 9mm caliber pistols, bearing serial numbers GKS0046685 and GKS0174104  |
| 5/21/2021                | 7/13/2021               | a Glock, model G43X, 9mm caliber pistol, bearing serial number BTTE206  |
| 6/3/2021                 | 7/16/2021               | a Sig Sauer, model P365X, 9mm caliber pistol, bearing serial numbers 66B623035  |
| 7/30/2021                | 12/27/2021              | a Sig Sauer, model P365, 9mm caliber pistol, bearing serial number 66B685226  |

| PURCHASE<br>DATE | RE-SALE<br>DATE | FIREARM(S)  |
|------------------|-----------------|---|
| Unknown          | 9/6/2019        | (1) a Heckler & Koch, model P30, 9mm caliber pistol, bearing serial number 129078094; and (2) a Heckler & Koch, model VP9, 9mm caliber pistol, bearing serial number 224151002  |
| Unknown          | 11/22/2019      | (1) an FN, model 509, 9mm caliber pistol, bearing serial number GKS0048822; and (2) a Sig Sauer, model P320-M17, 9mm caliber pistol, bearing serial number M17058536  |
| Unknown          | 2/22/2021       | (1) a Smith and Wesson, model M&P 15, multi-caliber rifle, bearing serial number SR02118; (2) an Anderson Manufacturing, model AM-15, multi-caliber rifle, bearing serial number 18147116; (3) a Remington Arms Model, model 700, .308 caliber rifle, bearing serial number RR81635C; and (4) a Remington Arms Model, model 700, .223 caliber rifle, bearing serial number RR56458B |
| Unknown          | 6/22/2021       | (1) a Sig Sauer, model P229, 9mm caliber pistol, bearing serial number AM127968; (2) a Remington Model, model 870, 12 gauge shotgun, bearing serial number A287637M; and (3) a Glock, model 17, 9mm caliber pistol, bearing serial number TDZ912  |
| Unknown          | 7/15/2021       | a Sig Sauer, model P365X, 9mm caliber pistol, bearing serial number 66A990842   |
| Unknown          | 7/16/2021       | (1) a Sig Sauer, model P365X, 9mm caliber pistol, bearing serial number 66B336500; (2) a Glock, model 43X, 9mm caliber pistol, bearing serial number BTTY676; and (3) a Smith & Wesson, model Shield, 9mm caliber pistol, bearing serial number RER0761   |
| Unknown          | 8/30/2021       | a CZ, model Shadow 2, 9mm caliber pistol, bearing serial number F070388   |
| Unknown          | 12/20/2021      | a Glock, model G19 Gen5, 9mm caliber pistol, bearing serial number BNKS912  |

| PURCHASE<br>DATE | RE-SALE<br>DATE | FIREARM(S)   |
|------------------|-----------------|--|
| Unknown          | 12/22/2021      | a Sig Sauer, model P320, 9mm caliber pistol, bearing serial number 58A159837 |
| Unknown          | 12/27/2021      | a Glock, model 43X, 9mm caliber, bearing serial number BNES590               |

7 A TRUE BILL  
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9 */s/*  
10 Foreperson

11 E. MARTIN ESTRADA  
12 United States Attorney



13  
14 MACK E. JENKINS  
15 Assistant United States Attorney  
16 Chief, Criminal Division

17 BENJAMIN R. BARRON  
18 Assistant United States Attorney  
19 Chief, Santa Ana Branch Office

20 JENNIFER L. WAIER  
21 Assistant United States Attorney  
22 Deputy Chief, Santa Ana Branch  
23 Office

24 ANNE C. GANNON  
25 Assistant United States Attorney  
26 Santa Ana Branch Office